

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,
Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,
Defendants

C.A. No.: 1:19-CV-10203-IT

**DEFENDANT COHEN BUSINESS LAW GROUP, PC AND JEFFREY A. COHEN,
ESQUIRE’S MOTION TO COMPEL PLAINTIFF’S SUPPLEMENTAL ANSWERS TO
EXPERT INTERROGATORIES**

Pursuant to Fed. R. Civ. P. 26 and 37(a)(2), the Defendants, Cohen Business Law Group, PC (“the Firm”) and Jeffrey A. Cohen, Esquire (together, “the Defendants”), hereby move this Honorable Court to issue an order compelling the Plaintiff Sonya Larson (“the Plaintiff”) to supplement her answers to the Defendants Interrogatories No. 13 and 14. As grounds, the Defendant states that under Fed. R. Civ. P. 26, the Plaintiff has a specific duty to disclose the identity of her expert witnesses, the opinions held by them, and the expected nature of their testimony. Such information must be disclosed, as it is essential to the Plaintiff’s ability to prove her claims, and the Defendants ability to prepare for trial.

Accordingly, the Defendants respectfully request that this Court issue an order compelling the Plaintiff to provide, within twenty (20) days, her supplemental answers to expert interrogatories. The Defendants have provided a memorandum of law in support of this motion.

THE DEFENDANTS,
COHEN BUSINESS LAW GROUP, PC,
AND JEFFREY A. COHEN, ESQUIRE,
BY THEIR ATTORNEYS,



DATED: September 23, 2021

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L.R. 7.1(a)(2) CERTIFICATION

I, Matthew H. Greene, certify that on September 24, 2021, I conferred with Plaintiffs' counsel pursuant to Local Rule 7.1(a)(2), and Plaintiffs' advised that they would file their opposition.

/s/ Matthew H. Greene, Esq. (BBO# 673947)

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing document has been served via email and/or first-class mail postage prepaid on all parties or their representatives in this action as listed below this 23rd day of September, 2021:

Counsel for Plaintiff, Sonya Larson:

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Defendant, Dawn Dorland Perry

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☐ Mark W. Shaughnessy, Esq. (BBO# 567839)

☐ Matthew H. Greene, Esq. (BBO# 673947)

***Counsel for Defendants, Cohen Business Law Group, PC and
Jeffrey A. Cohen, Esquire***